

REMARKS

Claims 5-6 stand rejected under 35 U.S.C. 102(e) as being anticipated by Murade (U.S. 6,531,996). Claims 5-6 have been cancelled without prejudice herein, rendering this rejection now moot.

Claims 1 and 3 stand rejected under 35 U.S.C. 103(a) as being unpatentable over a combination of Maekawa et al. (U.S. 5,686,936) in combination with either of Bennet et al. (Applicants assume the Examiner means the previously cited U.S. Patent No. 5,034,736 to Bennet) or Imamura (U.S. 6,091,392). Claim 3 has been cancelled without prejudice, rendering the rejections of this claim now moot. With respect to claim 1, however, Applicants respectfully traverse both rejections as follows.

None of the cited references, alone or in either proposed combination, teach or suggest that a plurality of driving devices are disposed on the same side of the data signal lines to be driven together simultaneously so as to increase the driving capability of the display, as in independent claim 1 of the present invention, as last amended. Additionally, none of the references teach or suggest that the number of driving devices used for driving each data signal line is controlled in accordance with a particular type of the display part, or that control of the number of driving devices is made with use of a switch signal, as now also in claim 1, as amended herein.

Applicants maintain and incorporate by reference herein those arguments previously advanced on paged 4 through 7 of Amendment C, filed February 28, 2005. Applicants respectfully request that the Examiner reconsider those arguments and withdraw

these outstanding Section 103 rejections at least in light of these previous arguments, which still fully apply to the present Application. Additionally, Applicants respectfully request that the Examiner consider the following expansions upon those previous arguments, as well as the new arguments in light of the additional amendments to claim 1 made herein.

In the “Response to Arguments” section of the outstanding Office Action (page 5), the Examiner makes several incorrect statements or incorrect characterizations of Applicants previous arguments. First, with respect to claims 1 and 3 of the present invention at least, Applicants previous arguments are not moot, as asserted by the Examiner, because the Examiner has provided no new grounds for rejection of these claims. Independent claim 1 of the present invention is identical to original claim 2 of the present invention if rewritten in independent form. Therefore, the “new” grounds for rejection of claim 1 are identical to those asserted in the previous Office Action.

Second, the Examiner has not properly characterized the previous arguments, and has not sufficiently answered their substance before repeating the previous rejection, as the Examiner is supposed to under Section 707.07(f) of the MPEP. Applicants did not merely argue that the Maekawa reference, by itself, fails to teach all of the limitations of the present invention, as implied by the Examiner. Instead, Applicants argued that the Examiner’s proposed *combination* of Maekawa with either Bennet or Imamura is what fails to teach or suggest all of the features and limitations of the present invention.

Independent claim 1 of the present invention, as last amended, features not only that a plurality of driving devices are used together simultaneously to increase the driving

capability of a display device, but also that this same plurality of driving devices are all disposed on the same side of the data signal lines in the device. The Examiner's proposed combination of Bennet or Imamura with Maekawa does not teach all of these limitations of claim 1.

Bennet and Imamura show a plurality of driving devices working together simultaneously to increase driving capability. The Examiner, however, has correctly acknowledged that neither reference teaches that the plurality of driving devices that are used together simultaneously to increase the driving capability are also provided on the same side of the data signal lines. The Examiner asserts only that Maekawa somehow makes up for these deficiencies in the Bennet and Imamura references. As previously argued though, Maekawa does not make up for these deficiencies.

The teachings of Maekawa cannot serve to modify either of the devices of Bennet or Imamura, as proposed by the Examiner. The plurality of driving devices, cited from the Bennet and Imamura references, are all used together simultaneously to increase driving capability. As previously explained to the Examiner, however, the "plurality" of drivers cited from the Maekawa reference do not work together simultaneously to increase driving capability, and therefore cannot be merely substituted with those from Bennet or Imamura. The two drivers in Maekawa do not drive the same types of signals, and therefore cannot increase driving capability for one type of signal by working together.

In contrast, claim 1 of the present invention as last amended recited, among other things, that: (A) a plurality of driving devices are used together simultaneously so as to

increase the driving capability of the device; (B) the plurality of driving devices are disposed on the same side of the data signal lines; and (C) the same plurality of driving devices that are used together simultaneously to increase driving capability are the same plurality of driving devices that are disposed on the same side of the data signal lines. Even if the Examiner were correct (which Applicants do not concede) that Bennet and Imamura teach limitation (A), and that Maekawa teaches limitation (B), the Examiner still has not cited to any objective teaching or suggestion in any of the cited references for limitation (C).

It is not enough for the Examiner merely to pick one element of the present invention from one prior art reference and choose a different element of the present invention from another prior art reference. The Examiner has an additional burden to demonstrate where the prior art teaches to combine these various elements from the different prior art references in the same way they are affirmatively claimed by the present invention. In the present case, however, the Examiner has not met this burden.

The present invention features a plurality of driving devices that are used simultaneously to increase driving capability, and advantageously locates them on the same side of the data signal lines. Maekawa provides no teaching to one skilled in the art to modify either Bennet or Imamura in such a way as the present invention. Maekawa does not even address driving devices that are used together simultaneously to increase driving capability, and therefore the reference could not provide any teaching or suggestion to one skilled in the art to modify Bennet or Imamura. Again, claim 1 of the present invention does not merely recite that a plurality of drivers is located on the same side of the data signal lines.

Claim 1 also recites that the plurality of driving devices that are used together simultaneously to increase the driving capability are the ones disposed on the same side of the data signal lines. This distinction is not subtle, and the Examiner has failed to give it proper consideration.

The Examiner also appears to have misunderstood other arguments by Applicants. Applicants did not argue that the three cited prior art references are nonanalogous art. What Applicants argued was that the Examiner's proposed combination was deficient because the devices of the various prior art references were nonanalogous. As explained above, Bennet and Imamura teach driving devices that are used together simultaneously to increase driving capability. The cited driving devices from Maekawa, on the other hand, do not contribute to increase the driving capability of the device, as described above. The proposed combination is therefore deficient because it would not be obvious to one skilled in the art how or why to combine such nonanalogous devices, as proposed by the Examiner.

Additionally, the Examiner's citation to col. 4, lines 46-48 of Maekawa fails to provide any direction to one skilled in the art of why Maekawa should be combined with either Bennet or Imamura. Nothing in this cited portion of Maekawa teaches or suggests the Examiner's broad assertion that *any* two drivers can be placed on the same side of data signal lines for greater ease of assembly, repair, and replacement. Maekawa teaches nothing about assembly, repair, or replacement of any elements of the device. In fact, the cited portion even

teaches away from this assertion by teaching that it is preferable to locate the different H driver 2 and the P driver 5 at opposite ends of the device. (Lines 46-48).

The cited portion from Maekawa only refers to two particular drivers (H and P) that deal with different signals, and provides no teaching or suggestion to one skilled in the art where to locate any plurality of drivers, and more particularly, any plurality of drivers that are used together simultaneously to increase the driving capability of a device. The core of the Examiner's expressed rationale, namely, ease of assembly, repair, and replacement in the device, is based only on the Examiner's own personal opinion, and not on any objective teaching the Examiner has cited in the record.

In light of all of the foregoing arguments, it should not be necessary to further amend the present claims. Nevertheless, in the sole interests of expediting prosecution, Applicants have further amended claim 1 herein to additionally incorporate the subject matter of claim 3, namely, that the number of driving devices used for driving each data signal line is controlled in accordance with a particular type of the display part, and also to recite that the control of the number of driving devices is made with the use of a switch signal. None of the cited references teach or suggest these additional features of claim 1. Support for this second modification to claim 1 can be found at least at page 16, lines 2-31 of the present Specification, for example.

With respect to the Examiner's assertions (first paragraph, page 5 of the outstanding Office Action) that "Imamura teaches the number of driving devices used for driving each data signal line is controlled in accordance with a particular type of display part

(resolution 640x400 or color LCD display with narrow electrode pitches),” the reference simply does not support these assertions. Imamura does discuss the different device configurations noted by the Examiner, but Imamura does not teach or suggest that control of the number of driving devices used for driving each data signal line is in accordance with either type of configuration noted. Imamura merely describes an undesirable prior art problem that is seen with the first configuration, and only states that its preferred method is desirable for the second configuration. No instruction is given to control the number of driving devices driving each signal line according to the configuration.

Lastly, none of the cited references teach or suggest the use of a switch signal for the control of the number of devices, as is now also recited in claim 1. This additional clarification to the claim renders the deficiencies in the references, as described in the previous paragraph, even that much more apparent. Accordingly, the Section 103 rejection of claim 1 is again traversed.

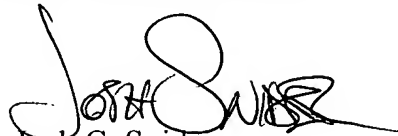
For all of the foregoing reasons, the outstanding Section 103 rejection of independent claim 1 of the present invention based on a combination of Maekawa with either of Bennet and Imamura should be withdrawn because the rejection is deficient on its face, and because the rejection has been sufficiently rebutted by Applicants. With respect to the outstanding rejection of claim 4 of the present invention, this claim depends from independent claim 1, and therefore includes all of the features of the base claim, plus additional features, and thus should be in condition for allowance for at least the reasons discussed above in traversing the rejection of independent claim 1.

For all of the foregoing reasons, Applicants submit that this Application, including claims 1 and 4, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

GREER, BURNS & CRAIN, LTD.

By

A handwritten signature in black ink, appearing to read "Josh C. Snider", with a stylized flourish at the end.

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